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**From:** Ontario Energy Board <webmaster@oeb.ca>  
**Sent:** Tuesday, February 17, 2026 11:05 AM  
**To:** Office of the Registrar <Registrar@oeb.ca>  
**Cc:** anaraghi@willmsshier.com  
**Subject:** Intervention Form: EB-2025-0295 - Low-Income Energy Network (LIEN)

# Intervention Form

## Case Number:

EB-2025-0295

## Requesting information on behalf:

Of an organization

## Intervenor Name:

Low-Income Energy Network (LIEN)

## Mandate and Objectives:

LIEN is a joint program of Advocacy Centre for Tenants Ontario (ACTO) and Canadian Environmental Law Association (CELA) and is funded by Legal Aid Ontario (LAO). ACTO and CELA, along with several other organizations, comprise the advisory committee of LIEN, which informs LIEN's strategic direction. LIEN was formed in 2004 by anti-poverty, affordable housing and environmental groups in response to the impact of rising energy prices on low-income Ontarians. LIEN has over 75 members from a broad range of environmental, legal, tenant, affordable housing, and social service organizations across Ontario that have endorsed our mandate. LIEN is directed by an Advisory Committee made up of representatives from across the province.

## Membership of the Intervenor and Constituency Represented:

LIEN has over 75 members from a broad range of non-profit environmental, legal, tenant, affordable housing, and social service organizations across Ontario that have endorsed LIEN's mandate. LIEN's membership is not available to governments or government agencies,

political parties, for profit corporations or associations and individuals.

## **Programs or Activities Carried Out by the Intervenor:**

LIEN seeks to raise awareness of and propose solutions to energy poverty in Ontario through:

- Outreach to community groups to involve them in LIEN;
- Outreach to the public, e.g. through the media;
- Participating in OEB proceedings, including hearings and consultative processes;
- Working with policy-makers and local utilities.

## **Governance Structure:**

As a joint program of ACTO and CELA, LIEN occupies a unique intersection of anti-poverty and public interest environmental advocacy and represents over 75 member groups across Ontario. As a network representing the intersection of interests related to low-income consumers and energy sustainability, LIEN's focus is on reducing the energy bills of all low-income consumers and providing low-income consumers with the opportunity to better manage their electricity bills. LIEN also advocates for low-income communities to be part of future approaches to energy generation and consumption, and for sustainable solutions to societal challenges such as climate change. LIEN is funded by LAO, ACTO and CELA, along with several other organizations, comprise the advisory committee of LIEN, which informs its strategic direction. The current Advisory Committee of LIEN includes the following organizations: • Advocacy Centre for Tenants Ontario (ACTO) • Canadian Environmental Alliance (CELA) • Neighbourhood Information Post (NIP) • Efficiency Canada • Kinna-aweya Legal Clinic LIEN has retained Judy Simon & Associates Inc. to provide consulting services to LIEN in this proceeding. Ms. Simon is an expert on energy policy and conservation in Ontario and has been retained for expert advice in many proceedings by LIEN, related to these issues. LIEN has also retained Mr. Matt Gardner and Mr. Ali Naraghi of Willms and Shier Environmental Lawyers LLP as legal counsel.

## **Representatives:**

Matt Gardner  
[mgardner@willmsshier.com](mailto:mgardner@willmsshier.com)  
4168624825

Ali Naraghi  
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4168624827

## **Cost Claim Filing contact:**

Swaberene Baksh  
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## **Other Contacts:**

Judy Simon

[judithbsimon@gmail.com](mailto:judithbsimon@gmail.com)

4168761372

## **Frequent Intervenor Form:**

**Add all individuals listed on our Frequent Intervenor Form as contacts for this proceeding:**

N/A

**Names and email addresses of individuals to be added as contacts for this proceeding:**

N/A

## **OEB Proceedings:**

<b>Item Description</b>	<b>Category</b>	<b>Status</b>
EB-2024-0198	OEB Consultations – Natural Gas	Granted
EB-2025-0125	OEB Consultations – Natural Gas	Granted
EB-2025-0156	OEB Policy Development	Granted
EB-2025-0268	OEB Policy Development	Granted
EB-2023-0125	OEB Consultations - Electricity	Granted
EB-2025-0227	OEB Consultations - Electricity	Granted

## **Issues:**

Enbridge Gas Inc. (EGI) is asking the Ontario Energy Board (OEB) for approval of a new natural gas DSM (conservation) plan, effective January 1, 2027, and the conservation programs that would be offered to customers under the plan in the years 2027 to 2030. EGI is asking the OEB to approve the conservation program budget of \$191 million which escalates over the 4-year term to \$227 million in 2030. Currently, EGI is implementing a natural gas conservation plan with a 2026 budget of \$200 million. EGI has also requested that the OEB determine, at the outset of the process, if the scope of its review will include consideration of the cost of carbon. The proposed conservation plan consists of programming for residential,

income qualified, commercial, industrial, and large volume customers. If the application is approved as filed, a typical residential customer in each of the rate zones in the table below will pay the following monthly amounts for natural gas conservation programs in 2027: Rate Zone Average Monthly Natural Gas Conservation Costs EGD Rate Zone (Rate 1) Current 2026 Proposed 2027 Proposed 2030 \$2.90 \$2.43 \$2.80 Union South Rate Zone (Rate M1) \$2.87 \$2.29 \$2.61 Union North Rate Zone (01) \$2.87 \$2.29 \$2.61 EGI's conservation programs and DSM framework are critical to low-income natural gas consumers in so far as they may impact these low-income consumers through EGI's rates. EGI's low-income DSM program offerings also provide natural gas savings and may provide natural gas bill reductions for low-income participants of these program offerings. LIEN intends to participate in this proceeding as an intervener to provide the OEB with a useful and unique perspective on behalf of low-income natural gas consumers. LIEN has been involved in EGI's DSM program hearings for many years and should provide input to ensure that EGI's DSM (conservation) framework, and future frameworks, as well as the specific low-income DSM program offerings EGI is proposing are appropriately designed to maximize natural gas savings opportunities for low-income customers of EGI. In addition, given the size of the residential DSM program budget that EGI is proposing, LIEN wants to ensure that the residential programs be appropriately designed since low-income customers, as part of the residential rate class, will have associated rate impacts for those programs.

## **Policy Interests:**

LIEN intends to intervene in this proceeding because low-income customers of EGI will be affected by this proceeding by both rate impacts to pay for any residential and low-income DSM programs approved by the OEB as well as providing the opportunity to participate in low-income DSM program offerings in 2027-2030, which will help low-income customers to better manage their natural gas bills.

## **Hearings:**

LIEN intends to participate in all aspects of this proceeding, including an oral hearing, if required. An oral hearing will provide LIEN with the opportunity to cross-examine witnesses and to participate in the proceeding in a fair and reasonable manner.

## **Evidence:**

LIEN does not intend to file evidence in this proceeding.

## **Coordination with Other Intervenors:**

LIEN intends to make reasonable efforts to co-ordinate its intervention with other potential intervenors such as the Vulnerable Energy Consumer Coalition (VECC), to the extent that LIEN's and VECC's interests are aligned. LIEN and VECC effectively coordinated in the EGI DSM Roll-over Application, EB-2024-0198.

## **Cost Awards:**

LIEN requests that the OEB find it eligible for costs under section 3.03 (a) of the OEB's Practice Direction on Cost Awards. LIEN "primarily represents the direct interests of consumers (e.g. ratepayers) in relation to services that are regulated by the Board". LIEN has been accepted as a party eligible for an award of costs in many other proceedings before the OEB including the most recent EGI DSM Rollover Application in EB-2024-0198. As a not-for-profit organization, LIEN's participation in this proceeding is dependent on any cost awards it receives. LIEN intends to coordinate its efforts with other stakeholders to avoid duplication where possible. LIEN has retained Judy Simon & Associates Inc. to provide consulting advice to LIEN in this proceeding. Judy Simon is an expert on energy policy and conservation in Ontario and has been retained for expert advice in many proceedings by LIEN, and other clients, related to these issues.

## **Language Preference:**

LIEN will participate in this proceeding in English.